DICKEN CRANE

Steven Clarke Mass EOEEA Clean Energy Technology Project Manager

Dear Members of the Advanced Biofuels Taskforce,

Back in the day when all our energy was renewable, Massachusetts's forests provided most of our raw materials and most of our heat and then our steam and even the fuel for the trains that eventually brought us coal and our addiction to fossil fuels. It is equally important to remember that our other source of renewable energy and every thing else we needed was water. Today we are looking for a future powered by renewable energy and a way to protect our forest and water resources. We also have the opportunity to protect forest and water resources around the globe by reducing our use of their products through the sustainable use and conservation of our own.

As other testimonies have pointed out, it would be wrong for the state to spend the public's resources on projects that won't reduce the amount of carbon we put in the atmosphere and won't benefit our local economy and won't protect our natural resources. We should be careful to avoid the easily overlooked unintended consequences of what look like good ideas.

Biomass energy from wood has the potential to be the largest source of renewable energy produced with in the state. It also can provide incentives to private landowners to maintain their land as forest. If the biomass plants are scaled properly and the forest management and harvesting are done responsibly the public will benefit from both. The profitable use of low-grade trees will improve the quality of our forests and our local economies. The Biofuels Taskforce should work with the Dept of Conservation and Recreation, the Dept. of Agricultural Resources and non-profit environmental organizatios to insure that forest derived biomass in Massachusetts is produced while protecting other forest resources. Revisions currently being made to CH 132, the Forest Cutting Practices Act should take into account the harvesting methods associated with biomass. Regulations should assure environmental protection but not be so onerous as to make harvesting of low-grade trees unaffordable. If we do not support these goals within the state much of our privately owned forests will be harvested anyway and the products, jobs and energy will be shipped out of state.

One of the biggest issues facing the efficient use of biomass is its effective use by businesses, schools and municipalities. Unfortunately, the energy bill that is currently in the conference committee does not include biomass in the net metering provisions granted to wind and solar electricity production. A way must be found to allow net metering for up to 2 MW biomass plants. Other issues related to decoupling and distributed generation must also be solved. The greatest efficiency in biomass production will come from these smaller plants located close to both the source of wood and the user of the energy. These smaller plants have the best opportunity to use both the heat and power and reduce the energy costs to businesses and the community. Sites for

DICKEN CRANE

these small to medium sized plants should be evaluated and secured now. Pour market conditions have caused many Massachusetts sawmills to go out of business. The remaining mills are facing financial difficulties and are at risk of being lost as well. These mills are well sited for biomass energy production. Purchasing a renewable energy production restriction (like an agricultural preservation restriction) on these sites and providing business incentives is an important step to providing appropriate sites for biomass energy production. The Biofuels Taskforce should support this effort.

Massachusetts is the third most densely populated state in the nation and the eighth most forested (percent of total land area that is forested), over 62%. Of that, over 75% is privately owned. This means that more people receive more ecosystem services, more public benefit, from private forestland than any other state. Ways must be found to provide incentives to landowners to maintain their land as forest to insure the public benefits they provide. One important way to support private forestland protection is through carbon credits. REGGI does not currently consider the protection or management of forestland to be a carbon offset. The science that will quantify the amount of carbon sequestered by different forest systems and different management practices is not complete. It is generally accepted that forestland once permanently converted to development will no longer have the capacity to sequester carbon or provide other ecosystem services it once had. The private forestland in Massachusetts is in the process of that conversion. Permanent protection will have a long-term public benefit. **The** Biofuels Taskforce should recognize the climate change mitigation value of Massachusetts's forestland and consider carbon credit or ecosystem services payments to forest landowners who provide long term protection for their forests.

Renewable energy produced from forest-derived biomass has impacts equal to if not greater in complexity than wind and solar energy. In Massachusetts it is our largest source of renewable energy. As with most challenges there are opportunities. Here we have the chance to reduce green house gas emissions, stimulate our rural economy, provide incentives for private forestland protection and reduce our demand on more fragile forest systems around the world. Government, industry, private landowners and non-profit environmental organizations must work together to understand the complicated relationships between our environment, our economy and our need for renewable energy and we don't have a lot of time to do it. The Advanced Biofuels Taskforce has a very important job and will need the input of as many interested people as possible. Through this process we have a chance to achieve the intended consequences.

Sincerely, Dicken Crane Massachusetts Forest Landowners Association